

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA**

**Civil Action No.: 9:22-cv-80417-RAR**

LA POTENCIA, LLC, a  
Delaware limited liability company,  
and YC52, LLC d/b/a CHANDLER BATS,  
a Florida limited liability company,

Plaintiff,

v.

DAVID CHANDLER, an individual,  
GROUP AUTHENTIC, LLC, a Delaware  
limited liability company, MAXBAT,  
INCORPORATED, a Minnesota corporation,  
PECOS LEAGUE OF PROFESSIONAL  
BASEBALL CLUBS, LLC, a Texas limited  
liability company, BESTBATDEALS.COM,

Defendants.

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**PLAINTIFFS' UNOPPOSED MOTION FOR DISBURSEMENT OF  
PRELIMINARY INJUNCTION BOND**

Plaintiffs, LA POTENCIA, LLC and YC52, LLC d/b/a CHANDLER BATS ("Plaintiffs"), by and through undersigned counsel, respectfully request an Order allowing disbursement of the preliminary injunction bond to Plaintiffs, and in support thereof state as follows:

1. On April 19, 2024, the Court entered an Order Granting Plaintiffs' Motion for Preliminary Injunction (ECF No. 293) and required Plaintiffs to post a \$100,000 injunction bond with the Clerk of Court for the duration of the preliminary injunction.
2. Plaintiffs posted the \$100,000 bond with the Clerk of Court on May 3, 2024 (receipt number FLS 286246). *See* ECF No. 301.

3. The parties have fully resolved this case and filed a Joint Stipulation of Dismissal on October 28, 2024. *See* ECF No. 337. Per the Court's Order at ECF No. 338, the parties will soon be filing a Renewed Joint Stipulation of Dismissal.

4. Plaintiffs contacted the Clerk regarding return and disbursement of the \$100,000 bond, and the Clerk indicated that Plaintiffs needed a Motion and Order. Thus, Plaintiffs respectfully request that the Court enter an Order directing the Clerk of Court to disburse and return the \$100,000 preliminary injunction bond to Plaintiff, La Potencia, LLC.

5. Defendants do not oppose the relief requested herein.

**WHEREFORE**, Plaintiffs respectfully request that the Court enter an Order directing the Clerk of Court to disburse and return the \$100,000 preliminary bond to Plaintiff, La Potencia, LLC, and for such other relief the Court deems just and proper.

**CERTIFICATE OF GOOD FAITH CONFERENCE**

Pursuant to Local Rule 7.1(a)(3), I hereby certify that counsel for the movant has conferred with all parties who may be affected by the relief sought in this motion, including counsel for Defendants. Defendants do not oppose this motion.

/s/ Joshua D. Martin  
Joshua D. Martin

Dated: October 30, 2024

Respectfully submitted,

By: /s/ Joshua D. Martin  
Joshua D. Martin  
Florida Bar No. 028100  
josh.martin@johnsonmartinlaw.com  
JOHNSON & MARTIN, P.A.  
500 W. Cypress Creek Rd., Suite 430  
Fort Lauderdale, Florida 33309  
Telephone: (954) 790-6699  
Facsimile: (954) 206-0017

Perry S. Clegg (*Pro Hac Vice*)  
perry.clegg@johnsonmartinlaw.com  
JOHNSON & MARTIN, P.A.  
50 W. Broadway, Suite 900  
Salt Lake City, Utah 84101  
Telephone: (801) 783-3200

*Attorneys for Plaintiffs and Third-Party Defendants*

**CERTIFICATE OF SERVICE**

I hereby certify that the counsel of record who are deemed to have consented to electronic service are being served on October 30, 2024 with a copy of this document via the Court's ECF system.

/s/ Joshua D. Martin  
Joshua D. Martin